

EXHIBIT F

1 Robert G. Litts (No. 205984)
CANDESCENT LAW GROUP
2 1350 Old Bayshore Hwy, Ste. 520
Burlingame, CA 94010
3 Telephone: (925) 644-1102
robert.litts@candescentlaw.com

4 Attorney for Non-Party
5 UNITED MICROELECTRONICS
CORPORATION

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA

9 OCEAN SEMICONDUCTOR LLC,

10 Plaintiff,

11 v.

12 MEDIATEK INC. AND MEDIATEK USA
13 INC.,

14 Defendants.

Case No. 6:20-cv-1210-ADA
(Pending in W.D. Tex.)

**NON-PARTY UNITED
MICROELECTRONICS
CORPORATION'S OBJECTIONS TO
OCEAN SEMICONDUCTOR LLC'S
SUBPOENA TO TESTIFY AT A
DEPOSITION IN A CIVIL ACTION**

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17 Pursuant to Rules 26, 30, 34 and 45 of the Federal Rules of Civil Procedure, non-party
18 United Microelectronics Corporation ("UMC") hereby objects to the Subpoena to Testify at a
19 Deposition in a Civil Action ("Subpoena") which was purportedly issued by Plaintiff Ocean
20 Semiconductor LLC ("Ocean" or "Plaintiff") in the above-captioned action and transmitted by
21 electronic mail to counsel for UMC on January 27, 2022. The Subpoena seeks deposition
22 testimony from UMC on eleven Deposition Topics (each a "Topic" and collectively the
23 "Topics") listed in Attachment A to the Subpoena, and production by UMC of documents,
24 electronically stored information ("ESI"), or objects described in twenty-two Requests for
25 Production of Documents (each a "Request" and collectively the "Requests") also listed in
26 Attachment A.

PRELIMINARY STATEMENT

A. UMC is a Taiwanese company having its headquarters in Hsinchu, Taiwan. Accordingly, UMC is beyond the subpoena power of United States courts, which have no jurisdiction over UMC for purposes of the Subpoena. Ocean failed to request and obtain issuance of a letter rogatory to the Appropriate Judicial Authority of Taiwan requesting their assistance in serving and enforcing the Subpoena, failed to provide a Chinese translation of the Subpoena, and failed to follow the other requirements under the Federal Rules of Civil Procedure, the United States Code, and Taiwan law for issuance of a subpoena to a Taiwanese entity. Moreover, Ocean's attempted service of the Subpoena by emailing an electronic copy to counsel for UMC is unauthorized under the Federal Rules of Civil Procedure and the United States Code, and is in contravention of Taiwan Law, and thus is improper and ineffective. Accordingly, UMC is under no obligation to respond to the Subpoena. Any production by UMC of information sought by the Subpoena would be entirely voluntary.

B. Nothing in these objections, no production by UMC of information sought by the Subpoena, and no request by UMC for additional protections in the underlying action through entry of a supplemental protective order or other measures should be construed as an acceptance by UMC of service of the Subpoena, as a submission by UMC to the jurisdiction of any United States court, or as a waiver by UMC of any rights under applicable rules and governing laws, including any objections regarding improper and ineffective service or lack of jurisdiction.

C. UMC's objections to a particular Request or Topic should not be interpreted as implying that documents responsive to the Request exist or that information covered by the Topic is known or reasonably available to UMC, or that UMC acknowledges the appropriateness of the Request or Topic.

D. Any production by UMC of information sought by the Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential information in the underlying action. UMC reserves the right to insist upon supplemental protections.

GENERAL OBJECTIONS

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2 1. UMC objects to the time, place, and manner specified in the Subpoena for
3 appearing for a deposition and producing documents to the extent they are inconvenient and
4 unduly burdensome to UMC. UMC will appear for a deposition and produce documents, if at
5 all, at a time and location, and in a manner, to be agreed upon by UMC and Ocean.

6 2. UMC objects to each Request and Topic to the extent it seeks to impose duties or
7 obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure or
8 any other applicable rule or law.

9 3. UMC objects to each Request and Topic to the extent it seeks information that is
10 protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or
11 any other applicable privilege or immunity.

12 4. UMC objects to each Request and Topic to the extent it seeks trade secret and/or
13 other confidential research, development, or commercial information. Any production by UMC
14 of information sought by the Subpoena will be made pursuant to the Protective Order governing
15 the disclosure of confidential information in the underlying action. UMC reserves the right to
16 insist upon supplemental protections.

17 5. UMC objects to each Request and Topic to the extent it seeks information not in
18 UMC's possession, custody or control.

19 6. UMC objects to each Request and Topic to the extent it seeks information that is
20 available from one or more parties to the underlying action and/or from public sources.

21 7. UMC objects to each Request and Topic to the extent it seeks information that is
22 more readily and/or appropriately available from, or confidential to, another non-party.

23 8. UMC objects to each Request and Topic to the extent it is duplicative of other
24 discovery already taken or requested in the underlying action.

25 9. UMC objects to each Request and Topic to the extent it seeks information that is
26 not relevant to any party's claim or defense and proportional to the needs of the case.

1 10. UMC objects to each Request and Topic to the extent it is overbroad, vague and
2 ambiguous, and/or imposes undue burden or expense upon UMC.

3 11. UMC objects to each Request and Topic to the extent it is not reasonably limited
4 in time and scope.

5 12. UMC objects to each Request and Topic to the extent that responding or
6 providing testimony would require subjective judgment and/or speculation on the part of UMC.

7 13. UMC objects to each Request and Topic to the extent that it calls for a legal
8 conclusion.

9 **OBJECTIONS TO DEFINITIONS**

10 1. UMC objects to the definition of “UMC,” “You,” and “Your” as overbroad,
11 vague and ambiguous, calling for a legal conclusion, and seeking to impose duties or obligations
12 beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the
13 extent it covers entities and persons other than UMC. For purposes of these objections, UMC
14 will interpret these terms to mean only United Microelectronics Corporation.

15 2. UMC objects to the definition of “Plaintiff,” “Ocean Semiconductor,” and
16 “Ocean” as overbroad, vague and ambiguous, calling for a legal conclusion, providing
17 insufficient identification and specificity, requiring subjective judgment and speculation, and
18 seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal
19 Rules of Civil Procedure, at least to the extent it covers entities and persons other than Ocean
20 Semiconductor LLC. For purposes of these objections, UMC will interpret these terms to mean
21 only Ocean Semiconductor LLC.

22 3. UMC objects to the definition of “ASML” as overbroad, vague and ambiguous,
23 calling for a legal conclusion, providing insufficient identification and specificity, requiring
24 subjective judgment and speculation, and seeking to impose duties or obligations beyond or
25 inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it
26 covers entities and persons other than ASML Holding N.V. and ASML Netherlands B.V. For
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1 purposes of these objections, UMC will interpret this term to mean only ASML Holding N.V.
2 and ASML Netherlands B.V.

3 4. UMC objects to the definition of “Applied Materials” as overbroad, vague and
4 ambiguous, calling for a legal conclusion, providing insufficient identification and specificity,
5 requiring subjective judgment and speculation, and seeking to impose duties or obligations
6 beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the
7 extent it covers entities and persons other than Applied Materials, Inc. For purposes of these
8 objections, UMC will interpret this term to mean only Applied Materials, Inc.

9 5. UMC objects to the definition of “PDF Solutions” as overbroad, vague and
10 ambiguous, calling for a legal conclusion, providing insufficient identification and specificity,
11 requiring subjective judgment and speculation, and seeking to impose duties or obligations
12 beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the
13 extent it covers entities and persons other than PDF Solutions, Inc. For purposes of these
14 objections, UMC will interpret this term to mean only PDF Solutions, Inc.

15 6. UMC objects to the definition of “Defendant” and “Defendants” as overbroad,
16 vague and ambiguous, calling for a legal conclusion, providing insufficient identification and
17 specificity, requiring subjective judgment and speculation, and seeking to impose duties or
18 obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at
19 least to the extent it covers entities and persons other than MediaTek Inc., MediaTek USA Inc.,
20 NVIDIA Corporation, NXP USA, Inc., Renesas Electronics Corporation, Renesas Electronics
21 America, Inc., STMicroelectronics, Inc., Analog Devices, Inc., Infineon Technologies AG, and
22 Infineon Technologies Americas Corp. For purposes of these objections, UMC will interpret
23 these terms to mean only MediaTek Inc., MediaTek USA Inc., NVIDIA Corporation, NXP USA,
24 Inc., Renesas Electronics Corporation, Renesas Electronics America, Inc., STMicroelectronics,
25 Inc., Analog Devices, Inc., Infineon Technologies AG, and Infineon Technologies Americas
26 Corp.

1 7. UMC objects to the definitions of “Mediatek Infringing Instrumentalities,”
2 “NVIDIA Infringing Instrumentalities,” “NXP Infringing Instrumentalities,” “Renesas Infringing
3 Instrumentalities,” “STMicro Infringing Instrumentalities,” “Analog Devices Infringing
4 Instrumentalities,” “Infineon Infringing Instrumentalities,” and “Infringing Instrumentalities” as
5 overbroad, vague and ambiguous, calling for a legal conclusion, providing insufficient
6 identification and specificity, requiring subjective judgment and speculation, and seeking to
7 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
8 Civil Procedure, at least to the extent they list product identifiers that are unfamiliar to UMC and
9 therefore would require UMC to speculate about what product(s) are associated with those
10 product identifiers and about the identity of the manufacturer(s) of those products, and to the
11 extent they would require UMC to speculate about what constitutes “similar systems, products,
12 devices, and integrated circuits.” UMC further objects to the definitions of these terms as
13 overbroad and vague and ambiguous, at least to the extent they improperly suggest that any
14 products associated with the listed product identifiers infringe the Asserted Patents. Alleged
15 infringement of the Asserted Patents has not yet been adjudicated in the underlying action.

16 8. UMC objects to the definitions of “person,” “documents,” “thing,” “sale,” “sold,”
17 “communication,” “identify,” “identity,” “information,” “describe,” “date,” “relate to,” “related
18 to,” “relating to,” “concerning,” and “possession,” at least to the extent they seek to impose
19 duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil
20 Procedure or any other applicable rule or law. For purposes of these objections, UMC will
21 interpret these terms in a manner consistent with Federal Rules of Civil Procedure and any other
22 applicable rules and laws.

23 9. UMC objects to the definition of “Advanced Process Control” and “APC” as
24 overbroad, vague and ambiguous, calling for a legal conclusion, providing insufficient
25 identification and specificity, requiring subjective judgment and speculation, and seeking to
26 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
27 Civil Procedure, at least to the extent it would require UMC to speculate about what constitutes
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1 “any computer integrated system or factory automation hardware or software for monitoring
2 and/or controlling processes and tools,” to the extent it covers systems, hardware, and/or
3 software that has not been identified by Ocean in its pleadings or in its Preliminary Disclosure of
4 Asserted Claims and Infringement Contentions in the underlying action and/or does not perform
5 the accused functionalities claimed in any of the Asserted Patents, and to the extent it is
6 inconsistent with any use of this term or similar terms in any of the Asserted Patents, or in any
7 claim construction order or other orders entered in the underlying action.

8 10. UMC objects to the definition of “Fault Detection and Classification” and “FDC”
9 as overbroad, vague and ambiguous, calling for a legal conclusion, providing insufficient
10 identification and specificity, requiring subjective judgment and speculation, and seeking to
11 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
12 Civil Procedure, at least to the extent it would require UMC to speculate about what constitutes
13 “any computer integrated hardware or software for the detection and/or classification of
14 manufacturing-related fault events,” to the extent it covers systems, hardware, and/or software
15 that has not been identified by Ocean in its pleadings or in its Preliminary Disclosure of Asserted
16 Claims and Infringement Contentions in the underlying action and/or does not perform the
17 accused functionalities claimed in any of the Asserted Patents, and to the extent it is inconsistent
18 with any use of this term or similar terms in any of the Asserted Patents, or in any claim
19 construction order or other orders entered in the underlying action.

20 11. UMC objects to the definition of “YieldStar” as overbroad, vague and ambiguous,
21 calling for a legal conclusion, providing insufficient identification and specificity, requiring
22 subjective judgment and speculation, and seeking to impose duties or obligations beyond or
23 inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it
24 would require UMC to speculate about what constitutes “any and all metrology and inspection
25 systems designed, developed, assembled, and/or manufactured by ASML,” “ASML’s optical
26 metrology systems,” “E-beam metrology and inspection systems,” and “all models, versions, and
27 their predecessors,” and to the extent it covers systems, hardware, and/or software that has not
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1 been identified by Ocean in its pleadings or in its Preliminary Disclosure of Asserted Claims and
2 Infringement Contentions in the underlying action and/or does not perform the accused
3 functionalities claimed in any of the Asserted Patents.

4 12. UMC objects to the definition of “TWINSCAN” as overbroad, vague and
5 ambiguous, calling for a legal conclusion, providing insufficient identification and specificity,
6 requiring subjective judgment and speculation, and seeking to impose duties or obligations
7 beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the
8 extent it would require UMC to speculate about what constitutes “any and all lithography
9 systems designed, developed, assembled, and/or manufactured by ASML,” “ASML’s deep
10 ultraviolet (DUV) lithography systems,” “extreme ultraviolet (EUV) lithography systems,”
11 “lithography systems that utilize more than one wafer table,” and “their predecessors,” and to the
12 extent it covers systems, hardware, and/or software that has not been identified by Ocean in its
13 pleadings or in its Preliminary Disclosure of Asserted Claims and Infringement Contentions in
14 the underlying action and/or does not perform the accused functionalities claimed in any of the
15 Asserted Patents.

16 13. UMC objects to the definition of “E3” as overbroad, vague and ambiguous,
17 calling for a legal conclusion, providing insufficient identification and specificity, requiring
18 subjective judgment and speculation, and seeking to impose duties or obligations beyond or
19 inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it
20 would require UMC to speculate about what constitutes “Applied Materials’ E3 framework,
21 platform, hardware, and/or software and all equipment modules of E3” and “all models, versions,
22 and their predecessors,” and to the extent it covers systems, hardware, and/or software that has
23 not been identified by Ocean in its pleadings or in its Preliminary Disclosure of Asserted Claims
24 and Infringement Contentions in the underlying action and/or does not perform the accused
25 functionalities claimed in any of the Asserted Patents.

26 14. UMC objects to the definition of “SmartFactory” as overbroad, vague and
27 ambiguous, calling for a legal conclusion, providing insufficient identification and specificity,
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1 requiring subjective judgment and speculation, and seeking to impose duties or obligations
2 beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the
3 extent it would require UMC to speculate about what constitutes “Applied Materials’
4 SmartFactory Productivity Solution framework, platform, hardware and/or software and all
5 equipment modules of SmartFactory” and “all models, versions, and their predecessors,” and to
6 the extent it covers systems, hardware, and/or software that has not been identified by Ocean in
7 its pleadings or in its Preliminary Disclosure of Asserted Claims and Infringement Contentions
8 in the underlying action and/or does not perform the accused functionalities claimed in any of the
9 Asserted Patents.

10 15. UMC objects to the definition of “Exensio” as overbroad, vague and ambiguous,
11 calling for a legal conclusion, providing insufficient identification and specificity, requiring
12 subjective judgment and speculation, and seeking to impose duties or obligations beyond or
13 inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it
14 would require UMC to speculate about what constitutes “PDF Solutions’ Exensio framework,
15 platform, hardware and/or software and all equipment modules of Exensio” and “all models,
16 versions, and their predecessors,” and to the extent it covers systems, hardware, and/or software
17 that has not been identified by Ocean in its pleadings or in its Preliminary Disclosure of Asserted
18 Claims and Infringement Contentions in the underlying action and/or does not perform the
19 accused functionalities claimed in any of the Asserted Patents.

20 16. UMC objects to the definition of “Manufacturing Equipment” as overbroad,
21 vague and ambiguous, calling for a legal conclusion, providing insufficient identification and
22 specificity, requiring subjective judgment and speculation, and seeking to impose duties or
23 obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at
24 least to the extent it refers to “TWINSCAN,” “YieldStar,” “E3,” “SmartFactory,” and “Exensio,”
25 for the same reasons as provided herein for those terms individually, and to the extent it would
26 require UMC to speculate about what constitutes “their respective frameworks, platforms,
27 hardware and/or software and all equipment modules.”
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1 17. UMC objects to the definition of “Equipment Manufacturers” as overbroad, vague
2 and ambiguous, calling for a legal conclusion, providing insufficient identification and
3 specificity, requiring subjective judgment and speculation, and seeking to impose duties or
4 obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at
5 least to the extent it refers to “Manufacturing Equipment,” for the same reasons as provided
6 herein for that term.

7 18. UMC objects to the definition of “MES” as overbroad, vague and ambiguous,
8 calling for a legal conclusion, providing insufficient identification and specificity, requiring
9 subjective judgment and speculation, and seeking to impose duties or obligations beyond or
10 inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it
11 would require UMC to speculate about what constitutes “any and all manufacturing execution
12 system used for monitoring, tracking, and/or documenting the process of manufacturing,
13 fabricating, and/or assembling,” to the extent it covers systems, hardware, and/or software that
14 has not been identified by Ocean in its pleadings or in its Preliminary Disclosure of Asserted
15 Claims and Infringement Contentions in the underlying action and/or does not perform the
16 accused functionalities claimed in any of the Asserted Patents, and to the extent it is inconsistent
17 with any use of this term or similar terms in any of the Asserted Patents, or in any claim
18 construction order or other orders entered in the underlying action.

19 19. UMC objects to the definition of “Product” and “Products” as overbroad, vague
20 and ambiguous, calling for a legal conclusion, providing insufficient identification and
21 specificity, requiring subjective judgment and speculation, and seeking to impose duties or
22 obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at
23 least to the extent it would require UMC to speculate about what constitutes “any and all
24 components, subcomponents, auxiliary components, and accessory products,” and to the extent it
25 covers systems, hardware, and/or software that has not been identified by Ocean in its pleadings
26 or in its Preliminary Disclosure of Asserted Claims and Infringement Contentions in the
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underlying action and/or does not perform the accused functionalities claimed in any of the Asserted Patents.

OBJECTIONS TO INSTRUCTIONS

1. UMC objects to the Instructions in Attachment A to the Subpoena to the extent they seek to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure or any other applicable rule or law.

SPECIFIC OBJECTIONS TO REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1:

Documents sufficient to show the use, utilization, installation, implementation, and/or deployment of any Manufacturing Equipment in any of Your manufacturing and/or fabrication facility in connection with Your manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities for any Defendant, including the identification of all versions and models of any such system and the location of such use, utilization, installation, implementation, and/or deployment including the location of any and all such fabrication facilities.

OBJECTIONS TO REQUEST NO. 1:

UMC incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC further objects to this Request to the extent it seeks information not in UMC's possession, custody or control.

UMC further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "any Manufacturing

1 Equipment,” about “Your manufacturing and/or fabrication facility,” about “any and all
2 Infringing Instrumentalities,” and about “any Defendant.”

3 UMC further objects to this Request as seeking information that is more readily and/or
4 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
5 information about “any Manufacturing Equipment.”

6 UMC further objects to this Request as seeking information that that is available from
7 one or more parties to the underlying action, and duplicative of other discovery already taken or
8 requested in the underlying action, at least to the extent it seeks information about “any and all
9 Infringing Instrumentalities for any Defendant.”

10 UMC further objects to this Request as seeking trade secret and/or other confidential
11 research, development, or commercial information, at least to the extent it seeks information
12 about “use, utilization, installation, implementation, and/or deployment of any Manufacturing
13 Equipment in any of Your manufacturing and/or fabrication facility,” about “Your manufacture,
14 fabrication, and/or assembly of any and all Infringing Instrumentalities for any Defendant,” and
15 about “identification of all versions and models of any such system and the location of such use,
16 utilization, installation, implementation, and/or deployment including the location of any and all
17 such fabrication facilities.” Any production by UMC of information sought by the Subpoena
18 will be made pursuant to the Protective Order governing the disclosure of confidential
19 information in the underlying action. UMC reserves the right to insist upon supplemental
20 protections.

21 In view of these specific objections and the foregoing Preliminary Statement, General
22 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
23 documents sought by this Request.

24 **REQUEST NO. 2:**

25 Purchase or sales orders, invoices, purchase agreements, sales agreements, and/or
26 supplier agreements relating to any Manufacturing Equipment.

1 **OBJECTIONS TO REQUEST NO. 2:**

2 UMC incorporates each of its General Objections, Objections to Definitions, and
3 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
4 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
5 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
6 this Request to the extent it seeks information not in UMC's possession, custody or control.

7 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
8 undue burden and expense, calling for a legal conclusion, providing insufficient identification
9 and specificity, requiring subjective judgment and speculation, seeking information that is not
10 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
11 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
12 Civil Procedure, at least to the extent it seeks information about "any Manufacturing
13 Equipment."

14 UMC further objects to this Request as seeking information that is more readily and/or
15 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
16 information about "[p]urchase or sales orders, invoices, purchase agreements, sales agreements,
17 and/or supplier agreements relating to any Manufacturing Equipment."

18 UMC further objects to this Request as seeking trade secret and/or other confidential
19 research, development, or commercial information, at least to the extent it seeks information
20 about "[p]urchase or sales orders, invoices, purchase agreements, sales agreements, and/or
21 supplier agreements relating to any Manufacturing Equipment." Any production by UMC of
22 information sought by the Subpoena will be made pursuant to the Protective Order governing the
23 disclosure of confidential information in the underlying action. UMC reserves the right to insist
24 upon supplemental protections.

25 In view of these specific objections and the foregoing Preliminary Statement, General
26 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
27 documents sought by this Request.
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REQUEST NO. 3:

Documents relating to the design, development, operation, and/or implementation of any APC and/or FDC hardware, software, systems, components, and/or modules by any entity other than Applied Materials or PDF Solutions that are/were used, utilized, installed, implemented and/or deployed in Your manufacturing, fabrication, and/or assembly tool, equipment, and/or facility in connection with Your manufacturing, fabrication, and/or assembly of any Infringing Instrumentalities, including any in-house and/or proprietary APC and/or FDC hardware, software, systems, components, and/or modules designed, developed, operated, and/or implemented by You.

OBJECTIONS TO REQUEST NO. 3:

UMC incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC further objects to this Request to the extent it seeks information not in UMC's possession, custody or control.

UMC further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "any APC and/or FDC hardware, software, systems, components, and/or modules by any entity other than Applied Materials or PDF Solutions," about "Your manufacturing, fabrication, and/or assembly tool, equipment, and/or facility," about "any Infringing Instrumentalities," and about "any in-house and/or proprietary APC and/or FDC hardware, software, systems, components, and/or modules designed, developed, operated, and/or implemented by You."

1 UMC further objects to this Request as seeking information that that is available from
2 one or more parties to the underlying action, and duplicative of other discovery already taken or
3 requested in the underlying action, at least to the extent it seeks information about “any
4 Infringing Instrumentalities.”

5 UMC further objects to this Request as seeking trade secret and/or other confidential
6 research, development, or commercial information, at least to the extent it seeks information
7 about “the design, development, operation, and/or implementation of any APC and/or FDC
8 hardware, software, systems, components, and/or modules ... that are/were used, utilized,
9 installed, implemented and/or deployed in Your manufacturing, fabrication, and/or assembly
10 tool, equipment, and/or facility,” about “Your manufacturing, fabrication, and/or assembly of
11 any Infringing Instrumentalities,” and about “any in-house and/or proprietary APC and/or FDC
12 hardware, software, systems, components, and/or modules designed, developed, operated, and/or
13 implemented by You.” Any production by UMC of information sought by the Subpoena will be
14 made pursuant to the Protective Order governing the disclosure of confidential information in the
15 underlying action. UMC reserves the right to insist upon supplemental protections.

16 In view of these specific objections and the foregoing Preliminary Statement, General
17 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
18 documents sought by this Request.

19 **REQUEST NO. 4:**

20 Documents sufficient to show the identity and role played by any and all Defendants in
21 the design, development, manufacture, testing, and/or importation of the Infringing
22 Instrumentalities that are/were fabricated, manufactured, and/or assembled by You using any
23 Manufacturing Equipment.

24 **OBJECTIONS TO REQUEST NO. 4:**

25 UMC incorporates each of its General Objections, Objections to Definitions, and
26 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
27 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
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1 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
2 this Request to the extent it seeks information not in UMC's possession, custody or control.

3 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
4 undue burden and expense, calling for a legal conclusion, providing insufficient identification
5 and specificity, requiring subjective judgment and speculation, seeking information that is not
6 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
7 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
8 Civil Procedure, at least to the extent it seeks information about "any and all Defendants," about
9 "Infringing Instrumentalities," and about "any Manufacturing Equipment."

10 UMC further objects to this Request as seeking information that is more readily and/or
11 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
12 information about "any Manufacturing Equipment."

13 UMC further objects to this Request as seeking information that that is available from
14 one or more parties to the underlying action, and duplicative of other discovery already taken or
15 requested in the underlying action, at least to the extent it seeks information about "the identity
16 and role played by any and all Defendants," and about "Infringing Instrumentalities."

17 UMC further objects to this Request as seeking trade secret and/or other confidential
18 research, development, or commercial information, at least to the extent it seeks information
19 about "the design, development, manufacture, testing, and/or importation of the Infringing
20 Instrumentalities that are/were fabricated, manufactured, and/or assembled by You using any
21 Manufacturing Equipment." Any production by UMC of information sought by the Subpoena
22 will be made pursuant to the Protective Order governing the disclosure of confidential
23 information in the underlying action. UMC reserves the right to insist upon supplemental
24 protections.

25 In view of these specific objections and the foregoing Preliminary Statement, General
26 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
27 documents sought by this Request.
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1 **REQUEST NO. 5:**

2 Documents sufficient to identify any and all systems, devices, components, or integrated
3 circuits manufactured, fabricated, and/or assembled on behalf of any and all Defendants using
4 any Manufacturing Equipment, including the identification of any and all applicable technology
5 node(s) for which such system is/was used.

6 **OBJECTIONS TO REQUEST NO. 5:**

7 UMC incorporates each of its General Objections, Objections to Definitions, and
8 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
9 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
10 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
11 this Request to the extent it seeks information not in UMC's possession, custody or control.

12 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
13 undue burden and expense, calling for a legal conclusion, providing insufficient identification
14 and specificity, requiring subjective judgment and speculation, seeking information that is not
15 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
16 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
17 Civil Procedure, at least to the extent it seeks information about "any and all Defendants," and
18 about "any Manufacturing Equipment."

19 UMC further objects to this Request as seeking information that is more readily and/or
20 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
21 information about "any Manufacturing Equipment."

22 UMC further objects to this Request as seeking information that that is available from
23 one or more parties to the underlying action, and duplicative of other discovery already taken or
24 requested in the underlying action, at least to the extent it seeks information about "any and all
25 systems, devices, components, or integrated circuits manufactured, fabricated, and/or assembled
26 on behalf of any and all Defendants."

1 UMC further objects to this Request as seeking trade secret and/or other confidential
 2 research, development, or commercial information, at least to the extent it seeks information
 3 about “any and all systems, devices, components, or integrated circuits manufactured, fabricated,
 4 and/or assembled on behalf of any and all Defendants using any Manufacturing Equipment” and
 5 about “identification of any and all applicable technology node(s) for which such system is/was
 6 used.” Any production by UMC of information sought by the Subpoena will be made pursuant
 7 to the Protective Order governing the disclosure of confidential information in the underlying
 8 action. UMC reserves the right to insist upon supplemental protections.

9 In view of these specific objections and the foregoing Preliminary Statement, General
 10 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
 11 documents sought by this Request.

12 **REQUEST NO. 6:**

13 Documents relating to Your agreement or contract with any and all Defendants to
 14 fabricate, manufacture, or assemble those systems, devices, components, and/or integrated
 15 circuits described in Request for Production No. 5, including, without limitation, master service
 16 agreements, partnership agreements, development agreements, contract manufacturing
 17 agreements, manufacturing supply agreements, supplier agreements, distribution agreements,
 18 manufacturing contract service level agreements, and semiconductor purchase agreements.

19 **OBJECTIONS TO REQUEST NO. 6:**

20 UMC incorporates each of its General Objections, Objections to Definitions, and
 21 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
 22 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
 23 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
 24 this Request to the extent it seeks information not in UMC’s possession, custody or control.

25 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
 26 undue burden and expense, calling for a legal conclusion, providing insufficient identification
 27 and specificity, requiring subjective judgment and speculation, seeking information that is not
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1 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
2 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
3 Civil Procedure, at least to the extent it seeks information about "any and all Defendants," and
4 about "those systems, devices, components, and/or integrated circuits described in Request for
5 Production No. 5."

6 UMC further objects to this Request as seeking information that that is available from
7 one or more parties to the underlying action, and duplicative of other discovery already taken or
8 requested in the underlying action, at least to the extent it seeks information about "Your
9 agreement or contract with any and all Defendants."

10 UMC further objects to this Request as seeking trade secret and/or other confidential
11 research, development, or commercial information, at least to the extent it seeks information
12 about "Your agreement or contract with any and all Defendants to fabricate, manufacture, or
13 assemble those systems, devices, components, and/or integrated circuits described in Request for
14 Production No. 5," and about "master service agreements, partnership agreements, development
15 agreements, contract manufacturing agreements, manufacturing supply agreements, supplier
16 agreements, distribution agreements, manufacturing contract service level agreements, and
17 semiconductor purchase agreements." Any production by UMC of information sought by the
18 Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential
19 information in the underlying action. UMC reserves the right to insist upon supplemental
20 protections.

21 In view of these specific objections and the foregoing Preliminary Statement, General
22 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
23 documents sought by this Request.

24 **REQUEST NO. 7:**

25 Documents relating to any agreement between You and any Equipment Manufacturer or
26 any of the Defendants to be indemnified by, or to indemnify, any Equipment Manufacturer or
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any of the Defendants for patent infringement in connection with Your use, utilization, installation, implementation, and/or deployment of any Manufacturing Equipment.

OBJECTIONS TO REQUEST NO. 7:

UMC incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC further objects to this Request to the extent it seeks information not in UMC's possession, custody or control.

UMC further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "any Equipment Manufacturer," about "any of the Defendants," and about "any Manufacturing Equipment."

UMC further objects to this Request as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it seeks information about "any agreement between You and any Equipment Manufacturer," and about "any Manufacturing Equipment."

UMC further objects to this Request as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it seeks information about "any agreement between You and ... any of the Defendants."

UMC further objects to this Request as seeking trade secret and/or other confidential research, development, or commercial information, at least to the extent it seeks information about "any agreement between You and any Equipment Manufacturer or any of the Defendants to be indemnified by, or to indemnify, any Equipment Manufacturer or any of the Defendants for

1 patent infringement,” and about “Your use, utilization, installation, implementation, and/or
2 deployment of any Manufacturing Equipment.” Any production by UMC of information sought
3 by the Subpoena will be made pursuant to the Protective Order governing the disclosure of
4 confidential information in the underlying action. UMC reserves the right to insist upon
5 supplemental protections.

6 In view of these specific objections and the foregoing Preliminary Statement, General
7 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
8 documents sought by this Request.

9 **REQUEST NO. 8:**

10 Documents sufficient to show the set-up, configuration, maintenance, and operation of
11 the Manufacturing Equipment including describing how You set up, configure, maintain, and/or
12 operate the Manufacturing Equipment involved in the manufacture, fabrication, and/or assembly
13 of any and all Infringing Instrumentalities.

14 **OBJECTIONS TO REQUEST NO. 8:**

15 UMC incorporates each of its General Objections, Objections to Definitions, and
16 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
17 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
18 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
19 this Request to the extent it seeks information not in UMC’s possession, custody or control.

20 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
21 undue burden and expense, calling for a legal conclusion, providing insufficient identification
22 and specificity, requiring subjective judgment and speculation, seeking information that is not
23 relevant to any party’s claim or defense and proportional to the needs of the case, and seeking to
24 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
25 Civil Procedure, at least to the extent it seeks information about “Manufacturing Equipment,”
26 and about “any and all Infringing Instrumentalities.”
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1 UMC further objects to this Request as seeking information that is more readily and/or
2 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
3 information about “Manufacturing Equipment.”

4 UMC further objects to this Request as seeking information that that is available from
5 one or more parties to the underlying action, and duplicative of other discovery already taken or
6 requested in the underlying action, at least to the extent it seeks information about “any and all
7 Infringing Instrumentalities.”

8 UMC further objects to this Request as seeking trade secret and/or other confidential
9 research, development, or commercial information, at least to the extent it seeks information
10 about “the set-up, configuration, maintenance, and operation of the Manufacturing Equipment,”
11 about “how You set up, configure, maintain, and/or operate the Manufacturing Equipment,” and
12 about “the manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities.”
13 Any production by UMC of information sought by the Subpoena will be made pursuant to the
14 Protective Order governing the disclosure of confidential information in the underlying action.
15 UMC reserves the right to insist upon supplemental protections.

16 In view of these specific objections and the foregoing Preliminary Statement, General
17 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
18 documents sought by this Request.

19 **REQUEST NO. 9:**

20 Documents sufficient to show technical, hardware, or software support requested by You
21 and sent to any of the Equipment Manufacturers in connection with Your use, utilization,
22 installation, implementation, and/or deployment of any and all Manufacturing Equipment.

23 **OBJECTIONS TO REQUEST NO. 9:**

24 UMC incorporates each of its General Objections, Objections to Definitions, and
25 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
26 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
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1 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
2 this Request to the extent it seeks information not in UMC's possession, custody or control.

3 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
4 undue burden and expense, calling for a legal conclusion, providing insufficient identification
5 and specificity, requiring subjective judgment and speculation, seeking information that is not
6 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
7 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
8 Civil Procedure, at least to the extent it seeks information about "any of the Equipment
9 Manufacturers," and about "any and all Manufacturing Equipment."

10 UMC further objects to this Request as seeking information that is more readily and/or
11 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
12 information about "technical, hardware, or software support requested by You and sent to any of
13 the Equipment Manufacturers," and about "Manufacturing Equipment."

14 UMC further objects to this Request as seeking trade secret and/or other confidential
15 research, development, or commercial information, at least to the extent it seeks information
16 about "technical, hardware, or software support requested by You and sent to any of the
17 Equipment Manufacturers," and about "Your use, utilization, installation, implementation, and/or
18 deployment of any and all Manufacturing Equipment." Any production by UMC of information
19 sought by the Subpoena will be made pursuant to the Protective Order governing the disclosure
20 of confidential information in the underlying action. UMC reserves the right to insist upon
21 supplemental protections.

22 In view of these specific objections and the foregoing Preliminary Statement, General
23 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
24 documents sought by this Request.

25 **REQUEST NO. 10:**

26 Documents sufficient to show the sales volume, revenues, costs of goods sold, gross
27 profits, operating costs, operating profits, and/or net profits directly or indirectly related to the
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1 manufacture, fabrication, and/or assembly of systems, devices, components, or integrated
2 circuits, including the Infringing Instrumentalities, that are/were manufactured, fabricated, and/or
3 assembly on behalf of any and all Defendants in connection with Your use, utilization,
4 installation, implementation, and/or deployment of the Manufacturing Equipment from 2014 to
5 the present.

6 **OBJECTIONS TO REQUEST NO. 10:**

7 UMC incorporates each of its General Objections, Objections to Definitions, and
8 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
9 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
10 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
11 this Request to the extent it seeks information not in UMC's possession, custody or control.

12 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
13 undue burden and expense, calling for a legal conclusion, providing insufficient identification
14 and specificity, requiring subjective judgment and speculation, seeking information that is not
15 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
16 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
17 Civil Procedure, at least to the extent it seeks information about "systems, devices, components,
18 or integrated circuits, including the Infringing Instrumentalities," about "any and all
19 Defendants," and about "Manufacturing Equipment."

20 UMC further objects to this Request as seeking information that is more readily and/or
21 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
22 information about "Manufacturing Equipment."

23 UMC further objects to this Request as seeking information that that is available from
24 one or more parties to the underlying action, and duplicative of other discovery already taken or
25 requested in the underlying action, at least to the extent it seeks information about "systems,
26 devices, components, or integrated circuits, including the Infringing Instrumentalities, that
27 are/were manufactured, fabricated, and/or assembly on behalf of any and all Defendants."
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1 UMC further objects to this Request as seeking trade secret and/or other confidential
2 research, development, or commercial information, at least to the extent it seeks information
3 about “sales volume, revenues, costs of goods sold, gross profits, operating costs, operating
4 profits, and/or net profits,” about “the manufacture, fabrication, and/or assembly of systems,
5 devices, components, or integrated circuits, including the Infringing Instrumentalities,” and about
6 “Your use, utilization, installation, implementation, and/or deployment of the Manufacturing
7 Equipment.” Any production by UMC of information sought by the Subpoena will be made
8 pursuant to the Protective Order governing the disclosure of confidential information in the
9 underlying action. UMC reserves the right to insist upon supplemental protections.

10 In view of these specific objections and the foregoing Preliminary Statement, General
11 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
12 documents sought by this Request.

13 **REQUEST NO. 11:**

14 Documents sufficient to show any manufacturing equipment, tool, and/or platform used,
15 utilized, installed, implemented, and/or deployed in any of Your manufacturing and/or
16 fabrication facilities that includes an adjustable wafer stage.

17 **OBJECTIONS TO REQUEST NO. 11:**

18 UMC incorporates each of its General Objections, Objections to Definitions, and
19 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
20 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
21 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
22 this Request to the extent it seeks information not in UMC’s possession, custody or control.

23 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
24 undue burden and expense, calling for a legal conclusion, providing insufficient identification
25 and specificity, requiring subjective judgment and speculation, seeking information that is not
26 relevant to any party’s claim or defense and proportional to the needs of the case, and seeking to
27 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
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1 Civil Procedure, at least to the extent it seeks information about “any manufacturing equipment,
2 tool, and/or platform,” and about “any of Your manufacturing and/or fabrication facilities that
3 includes an adjustable wafer stage.”

4 UMC further objects to this Request as seeking information that is more readily and/or
5 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
6 information about “any manufacturing equipment, tool, and/or platform ... that includes an
7 adjustable wafer stage.”

8 UMC further objects to this Request as seeking trade secret and/or other confidential
9 research, development, or commercial information, at least to the extent it seeks information
10 about “any manufacturing equipment, tool, and/or platform used, utilized, installed,
11 implemented, and/or deployed in any of Your manufacturing and/or fabrication facilities that
12 includes an adjustable wafer stage.” Any production by UMC of information sought by the
13 Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential
14 information in the underlying action. UMC reserves the right to insist upon supplemental
15 protections.

16 In view of these specific objections and the foregoing Preliminary Statement, General
17 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
18 documents sought by this Request.

19 **REQUEST NO. 12:**

20 Documents relating to identifying, detecting and/or determining whether a
21 manufacturing-related fault exists in Your manufacturing and/or fabrication tool and/or
22 equipment used for Your manufacture, fabrication, and/or assembly of any and all Infringing
23 Instrumentalities, any subsequent remedial actions taken in response to a manufacturing related
24 fault, as well as manufacturing-related actions taken by You in response to such manufacturing
25 and/or fabrication tool and/or equipment being malfunctioned, inoperable, and/or defective
26 during such manufacture, fabrication, and/or assembly.

1 **OBJECTIONS TO REQUEST NO. 12:**

2 UMC incorporates each of its General Objections, Objections to Definitions, and
3 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
4 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
5 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
6 this Request to the extent it seeks information not in UMC's possession, custody or control.

7 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
8 undue burden and expense, calling for a legal conclusion, providing insufficient identification
9 and specificity, requiring subjective judgment and speculation, seeking information that is not
10 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
11 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
12 Civil Procedure, at least to the extent it seeks information about "Your manufacturing and/or
13 fabrication tool and/or equipment," and about "any and all Infringing Instrumentalities."

14 UMC further objects to this Request as seeking information that is more readily and/or
15 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
16 information about "Your manufacturing and/or fabrication tool and/or equipment."

17 UMC further objects to this Request as seeking information that that is available from
18 one or more parties to the underlying action, and duplicative of other discovery already taken or
19 requested in the underlying action, at least to the extent it seeks information about "any and all
20 Infringing Instrumentalities."

21 UMC further objects to this Request as seeking trade secret and/or other confidential
22 research, development, or commercial information, at least to the extent it seeks information
23 about "identifying, detecting and/or determining whether a manufacturing-related fault exists in
24 Your manufacturing and/or fabrication tool and/or equipment," about "Your manufacture,
25 fabrication, and/or assembly of any and all Infringing Instrumentalities," about "any subsequent
26 remedial actions taken in response to a manufacturing related fault," and about "manufacturing-
27 related actions taken by You." in response to such manufacturing and/or fabrication tool and/or
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1 equipment being malfunctioned, inoperable, and/or defective.” Any production by UMC of
 2 information sought by the Subpoena will be made pursuant to the Protective Order governing the
 3 disclosure of confidential information in the underlying action. UMC reserves the right to insist
 4 upon supplemental protections.

5 In view of these specific objections and the foregoing Preliminary Statement, General
 6 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
 7 documents sought by this Request.

8 **REQUEST NO. 13:**

9 Documents relating to the translation of communications or data connection protocols
 10 (e.g., SECS (SEMI equipment communication standard), TCP/IP, OPC (OLE for Process
 11 Control), TIBCO, and ODP (optical data profiling)) between Your manufacturing and/or
 12 fabrication tool and/or equipment and Your FDC system, platform, and/or framework.

13 **OBJECTIONS TO REQUEST NO. 13:**

14 UMC incorporates each of its General Objections, Objections to Definitions, and
 15 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
 16 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
 17 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
 18 this Request to the extent it seeks information not in UMC’s possession, custody or control.

19 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
 20 undue burden and expense, calling for a legal conclusion, providing insufficient identification
 21 and specificity, requiring subjective judgment and speculation, seeking information that is not
 22 relevant to any party’s claim or defense and proportional to the needs of the case, and seeking to
 23 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
 24 Civil Procedure, at least to the extent it seeks information about “Your manufacturing and/or
 25 fabrication tool and/or equipment,” and about “Your FDC system, platform, and/or framework.”

26 UMC further objects to this Request as seeking information that is more readily and/or
 27 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
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1 information about “Your manufacturing and/or fabrication tool and/or equipment,” and about
2 “Your FDC system, platform, and/or framework.”

3 UMC further objects to this Request as seeking trade secret and/or other confidential
4 research, development, or commercial information, at least to the extent it seeks information
5 about “translation of communications or data connection protocols,” about “Your FDC system,
6 platform, and/or framework,” and about “Your FDC system, platform, and/or framework.” Any
7 production by UMC of information sought by the Subpoena will be made pursuant to the
8 Protective Order governing the disclosure of confidential information in the underlying action.
9 UMC reserves the right to insist upon supplemental protections.

10 In view of these specific objections and the foregoing Preliminary Statement, General
11 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
12 documents sought by this Request.

13 **REQUEST NO. 14:**

14 Documents sufficient to show the scheduling of factory events, preventive maintenance
15 (“PMs”), manufacturing tasks and/or qualification tests (“Quals”) in connection with Your
16 manufacturing and/or fabrication tool and/or equipment used for Your manufacture, fabrication,
17 and/or assembly of any and all Infringing Instrumentalities, including, without limitation,
18 scheduling of processing for lots and/or wafers, manufacturing and/or fabrication tool and/or
19 equipment, PMs and Quals, and/or manufacturing resources in connection with Your
20 manufacture, fabrication and/or assembly of the Infringing Instrumentalities.

21 **OBJECTIONS TO REQUEST NO. 14:**

22 UMC incorporates each of its General Objections, Objections to Definitions, and
23 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
24 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
25 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
26 this Request to the extent it seeks information not in UMC’s possession, custody or control.

1 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
2 undue burden and expense, calling for a legal conclusion, providing insufficient identification
3 and specificity, requiring subjective judgment and speculation, seeking information that is not
4 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
5 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
6 Civil Procedure, at least to the extent it seeks information about "Your manufacturing and/or
7 fabrication tool and/or equipment," and about "any and all Infringing Instrumentalities."

8 UMC further objects to this Request as seeking information that is more readily and/or
9 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
10 information about "Your manufacturing and/or fabrication tool and/or equipment."

11 UMC further objects to this Request as seeking information that that is available from
12 one or more parties to the underlying action, and duplicative of other discovery already taken or
13 requested in the underlying action, at least to the extent it seeks information about "any and all
14 Infringing Instrumentalities."

15 UMC further objects to this Request as seeking trade secret and/or other confidential
16 research, development, or commercial information, at least to the extent it seeks information
17 about "the scheduling of factory events, preventive maintenance ("PMs"), manufacturing tasks
18 and/or qualification tests ("Quals")," about "Your manufacturing and/or fabrication tool and/or
19 equipment," about "Your manufacture, fabrication, and/or assembly of any and all Infringing
20 Instrumentalities," and about "scheduling of processing for lots and/or wafers, manufacturing
21 and/or fabrication tool and/or equipment, PMs and Quals, and/or manufacturing resources." Any
22 production by UMC of information sought by the Subpoena will be made pursuant to the
23 Protective Order governing the disclosure of confidential information in the underlying action.
24 UMC reserves the right to insist upon supplemental protections.

25 In view of these specific objections and the foregoing Preliminary Statement, General
26 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
27 documents sought by this Request.
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REQUEST NO. 15:

Documents sufficient to show Your manufacturing execution system (“MES”) used, utilized, installed, implemented, and/or deployed at any of Your manufacturing and/or fabrication facilities in connection with Your manufacturing and/or fabrication tool and/or equipment used for Your manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities.

OBJECTIONS TO REQUEST NO. 15:

UMC incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC further objects to this Request to the extent it seeks information not in UMC’s possession, custody or control.

UMC further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party’s claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about “Your manufacturing execution system (“MES”),” about “Your manufacturing and/or fabrication facilities,” about “Your manufacturing and/or fabrication tool and/or equipment,” and about “any and all Infringing Instrumentalities.”

UMC further objects to this Request as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it seeks information about “Your manufacturing execution system (“MES”),” and about “Your manufacturing and/or fabrication tool and/or equipment.”

UMC further objects to this Request as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or

1 requested in the underlying action, at least to the extent it seeks information about “any and all
2 Infringing Instrumentalities.”

3 UMC further objects to this Request as seeking trade secret and/or other confidential
4 research, development, or commercial information, at least to the extent it seeks information
5 about “Your manufacturing execution system (“MES”),” about “Your manufacturing and/or
6 fabrication facilities,” about “Your manufacturing and/or fabrication tool and/or equipment,” and
7 about “Your manufacture, fabrication, and/or assembly of any and all Infringing
8 Instrumentalities.” Any production by UMC of information sought by the Subpoena will be
9 made pursuant to the Protective Order governing the disclosure of confidential information in the
10 underlying action. UMC reserves the right to insist upon supplemental protections.

11 In view of these specific objections and the foregoing Preliminary Statement, General
12 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
13 documents sought by this Request.

14 **REQUEST NO. 16:**

15 Documents sufficient to show Your measurement of critical dimension (“CD”) and/or
16 overlay in connection with any and all semiconductor wafers used for Your manufacture,
17 fabrication, and/or assembly of any and all Infringing Instrumentalities.

18 **OBJECTIONS TO REQUEST NO. 16:**

19 UMC incorporates each of its General Objections, Objections to Definitions, and
20 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
21 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
22 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
23 this Request to the extent it seeks information not in UMC’s possession, custody or control.

24 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
25 undue burden and expense, calling for a legal conclusion, providing insufficient identification
26 and specificity, requiring subjective judgment and speculation, seeking information that is not
27 relevant to any party’s claim or defense and proportional to the needs of the case, and seeking to
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1 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
2 Civil Procedure, at least to the extent it seeks information about “Your measurement of critical
3 dimension (“CD”) and/or overlay,” about “any and all semiconductor wafers,” and about “any
4 and all Infringing Instrumentalities.”

5 UMC further objects to this Request as seeking information that is more readily and/or
6 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
7 information about “Your measurement of critical dimension (“CD”) and/or overlay.”

8 UMC further objects to this Request as seeking information that that is available from
9 one or more parties to the underlying action, and duplicative of other discovery already taken or
10 requested in the underlying action, at least to the extent it seeks information about “any and all
11 Infringing Instrumentalities.”

12 UMC further objects to this Request as seeking trade secret and/or other confidential
13 research, development, or commercial information, at least to the extent it seeks information
14 about “Your measurement of critical dimension (“CD”) and/or overlay,” and about “Your
15 manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities.” Any
16 production by UMC of information sought by the Subpoena will be made pursuant to the
17 Protective Order governing the disclosure of confidential information in the underlying action.
18 UMC reserves the right to insist upon supplemental protections.

19 In view of these specific objections and the foregoing Preliminary Statement, General
20 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
21 documents sought by this Request.

22 **REQUEST NO. 17:**

23 Documents relating to Your collection of metrology data used in connection with Your
24 manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities, including
25 monitoring semiconductor wafers, modifying operating recipes, processing such metrology data
26 such as, without limitation, data filtering, and/or controlling Your manufacturing and/or
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1 fabrication tool and/or equipment used for Your manufacture, fabrication, and/or assembly of
2 any and all Infringing Instrumentalities.

3 **OBJECTIONS TO REQUEST NO. 17:**

4 UMC incorporates each of its General Objections, Objections to Definitions, and
5 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
6 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
7 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
8 this Request to the extent it seeks information not in UMC's possession, custody or control.

9 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
10 undue burden and expense, calling for a legal conclusion, providing insufficient identification
11 and specificity, requiring subjective judgment and speculation, seeking information that is not
12 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
13 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
14 Civil Procedure, at least to the extent it seeks information about "Your collection of metrology
15 data," about "any and all Infringing Instrumentalities," and about "Your manufacturing and/or
16 fabrication tool and/or equipment."

17 UMC further objects to this Request as seeking information that is more readily and/or
18 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
19 information about "Your collection of metrology data," and about "monitoring semiconductor
20 wafers, modifying operating recipes, processing such metrology data such as, without limitation,
21 data filtering, and/or controlling Your manufacturing and/or fabrication tool and/or equipment."

22 UMC further objects to this Request as seeking information that that is available from
23 one or more parties to the underlying action, and duplicative of other discovery already taken or
24 requested in the underlying action, at least to the extent it seeks information about "any and all
25 Infringing Instrumentalities."

26 UMC further objects to this Request as seeking trade secret and/or other confidential
27 research, development, or commercial information, at least to the extent it seeks information
28

1 about “Your collection of metrology data,” about “Your manufacture, fabrication, and/or
2 assembly of any and all Infringing Instrumentalities,” and about “monitoring semiconductor
3 wafers, modifying operating recipes, processing such metrology data such as, without limitation,
4 data filtering, and/or controlling Your manufacturing and/or fabrication tool and/or equipment.”
5 Any production by UMC of information sought by the Subpoena will be made pursuant to the
6 Protective Order governing the disclosure of confidential information in the underlying action.
7 UMC reserves the right to insist upon supplemental protections.

8 In view of these specific objections and the foregoing Preliminary Statement, General
9 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
10 documents sought by this Request.

11 **REQUEST NO. 18:**

12 Documents sufficient to show how You determine whether a manufacturing-related fault
13 identified, detected, and/or determined to exist in Your manufacturing and/or fabrication tool
14 and/or equipment used for Your manufacture, fabrication, and/or assembly of any and all
15 Infringing Instrumentalities is a false positive or false negative, or a fault that requires You to
16 remediate, rectify, cure, or correct such a fault.

17 **OBJECTIONS TO REQUEST NO. 18:**

18 UMC incorporates each of its General Objections, Objections to Definitions, and
19 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
20 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
21 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
22 this Request to the extent it seeks information not in UMC’s possession, custody or control.

23 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
24 undue burden and expense, calling for a legal conclusion, providing insufficient identification
25 and specificity, requiring subjective judgment and speculation, seeking information that is not
26 relevant to any party’s claim or defense and proportional to the needs of the case, and seeking to
27 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
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1 Civil Procedure, at least to the extent it seeks information about “Your manufacturing and/or
2 fabrication tool and/or equipment,” and about “any and all Infringing Instrumentalities.”

3 UMC further objects to this Request as seeking information that is more readily and/or
4 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
5 information about “how You determine whether a manufacturing-related fault identified,
6 detected, and/or determined to exist in Your manufacturing and/or fabrication tool and/or
7 equipment ... is a false positive or false negative, or a fault that requires You to remediate,
8 rectify, cure, or correct such a fault.”

9 UMC further objects to this Request as seeking information that that is available from
10 one or more parties to the underlying action, and duplicative of other discovery already taken or
11 requested in the underlying action, at least to the extent it seeks information about “any and all
12 Infringing Instrumentalities.”

13 UMC further objects to this Request as seeking trade secret and/or other confidential
14 research, development, or commercial information, at least to the extent it seeks information
15 about “how You determine whether a manufacturing-related fault identified, detected, and/or
16 determined to exist in Your manufacturing and/or fabrication tool and/or equipment ... is a false
17 positive or false negative, or a fault that requires You to remediate, rectify, cure, or correct such
18 a fault,” and about “Your manufacture, fabrication, and/or assembly of any and all Infringing
19 Instrumentalities.” Any production by UMC of information sought by the Subpoena will be
20 made pursuant to the Protective Order governing the disclosure of confidential information in the
21 underlying action. UMC reserves the right to insist upon supplemental protections.

22 In view of these specific objections and the foregoing Preliminary Statement, General
23 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
24 documents sought by this Request.

25 **REQUEST NO. 19:**

26 Documents sufficient to show any adjustment or modification to any fault detection
27 analysis as described in Request for Production No. 18, including any adjustment or modification
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1 of any parameters that contribute to the identification, detection, and/or determination as to
2 whether a manufacturing-related fault exists in Your manufacturing and/or fabrication tool
3 and/or equipment used for Your manufacture, fabrication, and/or assembly of any and all
4 Infringing Instrumentalities.

5 **OBJECTIONS TO REQUEST NO. 19:**

6 UMC incorporates each of its General Objections, Objections to Definitions, and
7 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
8 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
9 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
10 this Request to the extent it seeks information not in UMC's possession, custody or control.

11 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
12 undue burden and expense, calling for a legal conclusion, providing insufficient identification
13 and specificity, requiring subjective judgment and speculation, seeking information that is not
14 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
15 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
16 Civil Procedure, at least to the extent it seeks information about "Your manufacturing and/or
17 fabrication tool and/or equipment," and about "any and all Infringing Instrumentalities."

18 UMC further objects to this Request as seeking information that is more readily and/or
19 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
20 information about "any adjustment or modification to any fault detection analysis as described in
21 Request for Production No. 18," and about "any adjustment or modification of any parameters
22 that contribute to the identification, detection, and/or determination as to whether a
23 manufacturing-related fault exists in Your manufacturing and/or fabrication tool and/or
24 equipment."

25 UMC further objects to this Request as seeking information that that is available from
26 one or more parties to the underlying action, and duplicative of other discovery already taken or
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1 requested in the underlying action, at least to the extent it seeks information about “any and all
2 Infringing Instrumentalities.”

3 UMC further objects to this Request as seeking trade secret and/or other confidential
4 research, development, or commercial information, at least to the extent it seeks information
5 about “any adjustment or modification to any fault detection analysis as described in Request for
6 Production No. 18,” about “any adjustment or modification of any parameters that contribute to
7 the identification, detection, and/or determination as to whether a manufacturing-related fault
8 exists in Your manufacturing and/or fabrication tool and/or equipment,” and about “Your
9 manufacture, fabrication, and/or assembly of any and all Infringing Instrumentalities.” Any
10 production by UMC of information sought by the Subpoena will be made pursuant to the
11 Protective Order governing the disclosure of confidential information in the underlying action.
12 UMC reserves the right to insist upon supplemental protections.

13 In view of these specific objections and the foregoing Preliminary Statement, General
14 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
15 documents sought by this Request.

16 **REQUEST NO. 20:**

17 Documents relating to the importation into the United States and/or offer for sale, sale, or
18 use within the United States of any and all systems, devices, components, and/or integrated
19 circuits that are/were manufactured, fabricated, or assembled by You on behalf of any and all
20 Defendants in connection with the use, utilization, installation, implementation, and/or
21 deployment of the Manufacturing Equipment.

22 **OBJECTIONS TO REQUEST NO. 20:**

23 UMC incorporates each of its General Objections, Objections to Definitions, and
24 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
25 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
26 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
27 this Request to the extent it seeks information not in UMC’s possession, custody or control.
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1 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
2 undue burden and expense, calling for a legal conclusion, providing insufficient identification
3 and specificity, requiring subjective judgment and speculation, seeking information that is not
4 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
5 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
6 Civil Procedure, at least to the extent it seeks information about "any and all systems, devices,
7 components, and/or integrated circuits that are/were manufactured, fabricated, or assembled by
8 You on behalf of any and all Defendants."

9 UMC further objects to this Request as seeking information that that is available from
10 one or more parties to the underlying action, and duplicative of other discovery already taken or
11 requested in the underlying action, at least to the extent it seeks information about "importation
12 into the United States and/or offer for sale, sale, or use within the United States of any and all
13 systems, devices, components, and/or integrated circuits that are/were manufactured, fabricated,
14 or assembled by You on behalf of any and all Defendants."

15 UMC further objects to this Request as seeking trade secret and/or other confidential
16 research, development, or commercial information, at least to the extent it seeks information
17 about "importation into the United States and/or offer for sale, sale, or use within the United
18 States of any and all systems, devices, components, and/or integrated circuits that are/were
19 manufactured, fabricated, or assembled by You on behalf of any and all Defendants," and about
20 "use, utilization, installation, implementation, and/or deployment of the Manufacturing
21 Equipment." Any production by UMC of information sought by the Subpoena will be made
22 pursuant to the Protective Order governing the disclosure of confidential information in the
23 underlying action. UMC reserves the right to insist upon supplemental protections.

24 In view of these specific objections and the foregoing Preliminary Statement, General
25 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
26 documents sought by this Request.
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REQUEST NO. 21:

Documents relating to the importation into the United States and/or offer for sale, sale, or use within the United States of any and all systems, devices, components, and/or integrated circuits that are/were manufactured, fabricated, or assembled by You on behalf of any entity or entities other than Defendants, including but not limited to Silicon Laboratories Inc., Western Digital Technologies, Inc., Huawei Device USA, Inc., Huawei Device Co., Ltd., and HiSilicon Technologies Co., Ltd. in connection with the use, utilization, installation, implementation, and/or deployment of the Manufacturing Equipment.

OBJECTIONS TO REQUEST NO. 21:

UMC incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC further objects to this Request to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC further objects to this Request to the extent it seeks information not in UMC's possession, custody or control.

UMC further objects to this Request as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "any and all systems, devices, components, and/or integrated circuits that are/were manufactured, fabricated, or assembled by You on behalf of any entity or entities other than Defendants, including but not limited to Silicon Laboratories Inc., Western Digital Technologies, Inc., Huawei Device USA, Inc., Huawei Device Co., Ltd., and HiSilicon Technologies Co., Ltd."

UMC further objects to this Request as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it seeks information about "any and all

1 systems, devices, components, and/or integrated circuits that are/were manufactured, fabricated,
2 or assembled by You on behalf of any entity or entities other than Defendants, including but not
3 limited to Silicon Laboratories Inc., Western Digital Technologies, Inc., Huawei Device USA,
4 Inc., Huawei Device Co., Ltd., and HiSilicon Technologies Co., Ltd..”

5 UMC further objects to this Request as seeking trade secret and/or other confidential
6 research, development, or commercial information, at least to the extent it seeks information
7 about “any and all systems, devices, components, and/or integrated circuits that are/were
8 manufactured, fabricated, or assembled by You on behalf of any entity or entities other than
9 Defendants, including but not limited to Silicon Laboratories Inc., Western Digital Technologies,
10 Inc., Huawei Device USA, Inc., Huawei Device Co., Ltd., and HiSilicon Technologies Co.,
11 Ltd.,” and about “use, utilization, installation, implementation, and/or deployment of the
12 Manufacturing Equipment.” Any production by UMC of information sought by the Subpoena
13 will be made pursuant to the Protective Order governing the disclosure of confidential
14 information in the underlying action. UMC reserves the right to insist upon supplemental
15 protections.

16 In view of these specific objections and the foregoing Preliminary Statement, General
17 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
18 documents sought by this Request.

19 **REQUEST NO. 22:**

20 Documents sufficient to show royalties You paid to any Equipment Manufacturers
21 related to the use, utilization, installation, implementation, and/or deployment of the
22 Manufacturing Equipment.

23 **OBJECTIONS TO REQUEST NO. 22:**

24 UMC incorporates each of its General Objections, Objections to Definitions, and
25 Objections to Instructions herein by reference. UMC further objects to this Request to the extent
26 it seeks information that is protected from discovery by the attorney-client privilege, the attorney
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1 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
2 this Request to the extent it seeks information not in UMC's possession, custody or control.

3 UMC further objects to this Request as overbroad, vague and ambiguous, imposing
4 undue burden and expense, calling for a legal conclusion, providing insufficient identification
5 and specificity, requiring subjective judgment and speculation, seeking information that is not
6 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
7 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
8 Civil Procedure, at least to the extent it seeks information about "any Equipment
9 Manufacturers," and about "Manufacturing Equipment."

10 UMC further objects to this Request as seeking information that is more readily and/or
11 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
12 information about "royalties You paid to any Equipment Manufacturers," and about "use,
13 utilization, installation, implementation, and/or deployment of the Manufacturing Equipment."

14 UMC further objects to this Request as seeking trade secret and/or other confidential
15 research, development, or commercial information, at least to the extent it seeks information
16 about "royalties You paid to any Equipment Manufacturers," and about "use, utilization,
17 installation, implementation, and/or deployment of the Manufacturing Equipment." Any
18 production by UMC of information sought by the Subpoena will be made pursuant to the
19 Protective Order governing the disclosure of confidential information in the underlying action.
20 UMC reserves the right to insist upon supplemental protections.

21 In view of these specific objections and the foregoing Preliminary Statement, General
22 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing
23 documents sought by this Request.

**SPECIFIC OBJECTIONS TO
DEPOSITION TOPICS**

TOPIC NO. 1:

Explanation of the context or content of the Documents that You produced in response to the Requests for Production of Documents.

OBJECTIONS TO TOPIC NO. 1:

UMC incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC further objects to this Topic to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC further objects to this Topic to the extent it seeks information not in UMC's possession, custody or control.

UMC further objects to this Topic as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it refers to the Requests, for the same reasons as provided herein for each Request individually.

UMC further objects to this Topic as seeking information that is more readily and/or appropriately available from, or confidential to, another non-party, at least to the extent it refers to the Requests, for the same reasons as provided herein for each Request individually.

UMC further objects to this Topic as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it refers to the Requests, for the same reasons as provided herein for each Request individually.

UMC further objects to this Topic as seeking trade secret and/or other confidential research, development, or commercial information, at least to the extent it refers to the Requests,

1 for the same reasons as provided herein for each Request individually. Any production by UMC
2 of information sought by the Subpoena will be made pursuant to the Protective Order governing
3 the disclosure of confidential information in the underlying action. UMC reserves the right to
4 insist upon supplemental protections.

5 In view of these specific objections and the foregoing Preliminary Statement, General
6 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing a
7 witness to testify on UMC's behalf about this Topic.

8 **TOPIC NO. 2:**

9 The source and authenticity of the Documents produced by You in response to the
10 Requests for Production of Documents, including without limitation the processes, systems,
11 persons and locations that are involved in creating, generating, storing, and/or maintaining any of
12 the produced documents as business records.

13 **OBJECTIONS TO TOPIC NO. 2:**

14 UMC incorporates each of its General Objections, Objections to Definitions, and
15 Objections to Instructions herein by reference. UMC further objects to this Topic to the extent it
16 seeks information that is protected from discovery by the attorney-client privilege, the attorney
17 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
18 this Topic to the extent it seeks information not in UMC's possession, custody or control.

19 UMC further objects to this Topic as overbroad, vague and ambiguous, imposing undue
20 burden and expense, calling for a legal conclusion, providing insufficient identification and
21 specificity, requiring subjective judgment and speculation, seeking information that is not
22 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
23 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
24 Civil Procedure, at least to the extent it refers to the Requests, for the same reasons as provided
25 herein for each Request individually.

1 UMC further objects to this Topic as seeking information that is more readily and/or
2 appropriately available from, or confidential to, another non-party, at least to the extent it refers
3 to the Requests, for the same reasons as provided herein for each Request individually.

4 UMC further objects to this Topic as seeking information that that is available from one
5 or more parties to the underlying action, and duplicative of other discovery already taken or
6 requested in the underlying action, at least to the extent it refers to the Requests, for the same
7 reasons as provided herein for each Request individually.

8 UMC further objects to this Topic as seeking trade secret and/or other confidential
9 research, development, or commercial information, at least to the extent it refers to the Requests,
10 for the same reasons as provided herein for each Request individually. Any production by UMC
11 of information sought by the Subpoena will be made pursuant to the Protective Order governing
12 the disclosure of confidential information in the underlying action. UMC reserves the right to
13 insist upon supplemental protections.

14 In view of these specific objections and the foregoing Preliminary Statement, General
15 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing a
16 witness to testify on UMC's behalf about this Topic.

17 **TOPIC NO. 3:**

18 The extent and scope of use of any and all Manufacturing Equipment that is/was used,
19 utilized, installed, implemented or deployed by You in connection with the manufacture,
20 fabrication, and/or assembly of the Infringing Instrumentalities, including any and all contracts
21 and/or agreements between You and Equipment Manufacturers relating to the use, utilization,
22 installation, implementation, and/or deployment of the Manufacturing Equipment at Your
23 manufacturing and/or fabrication facilities.

24 **OBJECTIONS TO TOPIC NO. 3:**

25 UMC incorporates each of its General Objections, Objections to Definitions, and
26 Objections to Instructions herein by reference. UMC further objects to this Topic to the extent it
27 seeks information that is protected from discovery by the attorney-client privilege, the attorney
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1 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
2 this Topic to the extent it seeks information not in UMC's possession, custody or control.

3 UMC further objects to this Topic as overbroad, vague and ambiguous, imposing undue
4 burden and expense, calling for a legal conclusion, providing insufficient identification and
5 specificity, requiring subjective judgment and speculation, seeking information that is not
6 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
7 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
8 Civil Procedure, at least to the extent it seeks information about "any and all Manufacturing
9 Equipment," about "Infringing Instrumentalities," about "Equipment Manufacturers," about "any
10 and all contracts and/or agreements," and about "Your manufacturing and/or fabrication
11 facilities."

12 UMC further objects to this Topic as seeking information that is more readily and/or
13 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
14 information about "Manufacturing Equipment," and about "any and all contracts and/or
15 agreements between You and Equipment Manufacturers."

16 UMC further objects to this Topic as seeking information that that is available from one
17 or more parties to the underlying action, and duplicative of other discovery already taken or
18 requested in the underlying action, at least to the extent it seeks information about "Infringing
19 Instrumentalities."

20 UMC further objects to this Topic as seeking trade secret and/or other confidential
21 research, development, or commercial information, at least to the extent it seeks information
22 about "[t]he extent and scope of use of any and all Manufacturing Equipment that is/was used,
23 utilized, installed, implemented or deployed by You," about "the manufacture, fabrication,
24 and/or assembly of the Infringing Instrumentalities," about "any and all contracts and/or
25 agreements between You and Equipment Manufacturers," and about "use, utilization,
26 installation, implementation, and/or deployment of the Manufacturing Equipment at Your
27 manufacturing and/or fabrication facilities." Any production by UMC of information sought by
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1 the Subpoena will be made pursuant to the Protective Order governing the disclosure of
2 confidential information in the underlying action. UMC reserves the right to insist upon
3 supplemental protections.

4 In view of these specific objections and the foregoing Preliminary Statement, General
5 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing a
6 witness to testify on UMC's behalf about this Topic.

7 **TOPIC NO. 4:**

8 Your use, utilization, installation, implementation, deployment, operation, testing,
9 qualification, configuration, and maintenance of any and all Manufacturing Equipment, and/or
10 any in-house or proprietary tool and/or equipment used in your manufacturing and/or facility to
11 manufacture, fabricate, and/or assemble the Infringing Instrumentalities.

12 **OBJECTIONS TO TOPIC NO. 4:**

13 UMC incorporates each of its General Objections, Objections to Definitions, and
14 Objections to Instructions herein by reference. UMC further objects to this Topic to the extent it
15 seeks information that is protected from discovery by the attorney-client privilege, the attorney
16 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
17 this Topic to the extent it seeks information not in UMC's possession, custody or control.

18 UMC further objects to this Topic as overbroad, vague and ambiguous, imposing undue
19 burden and expense, calling for a legal conclusion, providing insufficient identification and
20 specificity, requiring subjective judgment and speculation, seeking information that is not
21 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
22 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
23 Civil Procedure, at least to the extent it seeks information about "any and all Manufacturing
24 Equipment," about "any in-house or proprietary tool and/or equipment ," about "your
25 manufacturing and/or facility ," and about "Infringing Instrumentalities."

1 UMC further objects to this Topic as seeking information that is more readily and/or
2 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
3 information about “any and all Manufacturing Equipment.”

4 UMC further objects to this Topic as seeking information that that is available from one
5 or more parties to the underlying action, and duplicative of other discovery already taken or
6 requested in the underlying action, at least to the extent it seeks information about “Infringing
7 Instrumentalities.”

8 UMC further objects to this Topic as seeking trade secret and/or other confidential
9 research, development, or commercial information, at least to the extent it seeks information
10 about “Your use, utilization, installation, implementation, deployment, operation, testing,
11 qualification, configuration, and maintenance of any and all Manufacturing Equipment,” and
12 about “any in-house or proprietary tool and/or equipment used in your manufacturing and/or
13 facility.” Any production by UMC of information sought by the Subpoena will be made
14 pursuant to the Protective Order governing the disclosure of confidential information in the
15 underlying action. UMC reserves the right to insist upon supplemental protections.

16 In view of these specific objections and the foregoing Preliminary Statement, General
17 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing a
18 witness to testify on UMC’s behalf about this Topic.

19 **TOPIC NO. 5:**

20 Manufacturing facilities owned, controlled or operated by or on Your behalf or Your
21 subsidiaries where the Manufacturing Equipment is/was used, utilized, installed, implemented
22 and/or deployed.

23 **OBJECTIONS TO TOPIC NO. 5:**

24 UMC incorporates each of its General Objections, Objections to Definitions, and
25 Objections to Instructions herein by reference. UMC further objects to this Topic to the extent it
26 seeks information that is protected from discovery by the attorney-client privilege, the attorney
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1 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
2 this Topic to the extent it seeks information not in UMC's possession, custody or control.

3 UMC further objects to this Topic as overbroad, vague and ambiguous, imposing undue
4 burden and expense, calling for a legal conclusion, providing insufficient identification and
5 specificity, requiring subjective judgment and speculation, seeking information that is not
6 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
7 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
8 Civil Procedure, at least to the extent it seeks information about "Manufacturing facilities owned,
9 controlled or operated by or on Your behalf or Your subsidiaries," and about "Manufacturing
10 Equipment."

11 UMC further objects to this Request as seeking information that is more readily and/or
12 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
13 information about "Manufacturing Equipment."

14 UMC further objects to this Topic as seeking trade secret and/or other confidential
15 research, development, or commercial information, at least to the extent it seeks information
16 about "Manufacturing facilities ... where the Manufacturing Equipment is/was used, utilized,
17 installed, implemented and/or deployed." Any production by UMC of information sought by the
18 Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential
19 information in the underlying action. UMC reserves the right to insist upon supplemental
20 protections.

21 In view of these specific objections and the foregoing Preliminary Statement, General
22 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing a
23 witness to testify on UMC's behalf about this Topic.

24 **TOPIC NO. 6:**

25 Any making, using, selling, or offers to sell the Infringing Instrumentalities within the
26 United States, or importing into the United States of the Infringing Instrumentalities, including
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any and all contracts and/or agreements between You and any and all Defendants governing Your making, using, selling, offering to sell, or importation of the Infringing Instrumentalities.

OBJECTIONS TO TOPIC NO. 6:

UMC incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC further objects to this Topic to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC further objects to this Topic to the extent it seeks information not in UMC's possession, custody or control.

UMC further objects to this Topic as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party's claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it seeks information about "Infringing Instrumentalities," about "any and all contracts and/or agreements," and about "any and all Defendants."

UMC further objects to this Topic as seeking information that that is available from one or more parties to the underlying action, and duplicative of other discovery already taken or requested in the underlying action, at least to the extent it seeks information about "[a]ny making, using, selling, or offers to sell the Infringing Instrumentalities within the United States," about "importing into the United States of the Infringing Instrumentalities," and about "any and all contracts and/or agreements between You and any and all Defendants."

UMC further objects to this Topic as seeking trade secret and/or other confidential research, development, or commercial information, at least to the extent it seeks information about "[a]ny making, using, selling, or offers to sell the Infringing Instrumentalities within the United States ," about "importing into the United States of the Infringing Instrumentalities," about "any and all contracts and/or agreements between You and any and all Defendants," and about "Your making, using, selling, offering to sell, or importation of the Infringing

Instrumentalities.” Any production by UMC of information sought by the Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential information in the underlying action. UMC reserves the right to insist upon supplemental protections.

In view of these specific objections and the foregoing Preliminary Statement, General Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing a witness to testify on UMC’s behalf about this Topic.

TOPIC NO. 7:

Your first awareness of the Asserted Patents.

OBJECTIONS TO TOPIC NO. 7:

UMC incorporates each of its General Objections, Objections to Definitions, and Objections to Instructions herein by reference. UMC further objects to this Topic to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity. UMC further objects to this Topic to the extent it seeks information not in UMC’s possession, custody or control.

UMC further objects to this Topic as overbroad, vague and ambiguous, imposing undue burden and expense, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, seeking information that is not relevant to any party’s claim or defense and proportional to the needs of the case, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least because UMC is not a defendant in the underlying action.

In view of these specific objections and the foregoing Preliminary Statement, General Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing a witness to testify on UMC’s behalf about this Topic.

TOPIC NO. 8:

The means by which You identify each of the Infringing Instrumentalities, including, but not limited to, any internal or external reference or part numbers used to identify such instrumentalities when sold to, or made for, any Defendant.

1 **OBJECTIONS TO TOPIC NO. 8:**

2 UMC incorporates each of its General Objections, Objections to Definitions, and
3 Objections to Instructions herein by reference. UMC further objects to this Topic to the extent it
4 seeks information that is protected from discovery by the attorney-client privilege, the attorney
5 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
6 this Topic to the extent it seeks information not in UMC's possession, custody or control.

7 UMC further objects to this Topic as overbroad, vague and ambiguous, imposing undue
8 burden and expense, calling for a legal conclusion, providing insufficient identification and
9 specificity, requiring subjective judgment and speculation, seeking information that is not
10 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
11 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
12 Civil Procedure, at least to the extent it seeks information about "Infringing Instrumentalities,"
13 and about "any Defendant."

14 UMC further objects to this Topic as seeking information that that is available from one
15 or more parties to the underlying action, and duplicative of other discovery already taken or
16 requested in the underlying action, at least to the extent it seeks information about "Infringing
17 Instrumentalities," and about "any internal or external reference or part numbers used to identify
18 such Instrumentalities."

19 UMC further objects to this Topic as seeking trade secret and/or other confidential
20 research, development, or commercial information, at least to the extent it seeks information
21 about "[t]he means by which You identify each of the Infringing Instrumentalities," about "any
22 internal or external reference or part numbers used to identify such Instrumentalities." Any
23 production by UMC of information sought by the Subpoena will be made pursuant to the
24 Protective Order governing the disclosure of confidential information in the underlying action.
25 UMC reserves the right to insist upon supplemental protections.

1 In view of these specific objections and the foregoing Preliminary Statement, General
2 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing a
3 witness to testify on UMC's behalf about this Topic.

4 **TOPIC NO. 9:**

5 Revenue, costs and profits that You derive from the manufacture, fabrication, and/or
6 assembly of the Infringing Instrumentalities.

7 **OBJECTIONS TO TOPIC NO. 9:**

8 UMC incorporates each of its General Objections, Objections to Definitions, and
9 Objections to Instructions herein by reference. UMC further objects to this Topic to the extent it
10 seeks information that is protected from discovery by the attorney-client privilege, the attorney
11 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
12 this Topic to the extent it seeks information not in UMC's possession, custody or control.

13 UMC further objects to this Topic as overbroad, vague and ambiguous, imposing undue
14 burden and expense, calling for a legal conclusion, providing insufficient identification and
15 specificity, requiring subjective judgment and speculation, seeking information that is not
16 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
17 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
18 Civil Procedure, at least to the extent it seeks information about "Infringing Instrumentalities."

19 UMC further objects to this Topic as seeking information that that is available from one
20 or more parties to the underlying action, and duplicative of other discovery already taken or
21 requested in the underlying action, at least to the extent it seeks information about "Infringing
22 Instrumentalities."

23 UMC further objects to this Topic as seeking trade secret and/or other confidential
24 research, development, or commercial information, at least to the extent it seeks information
25 about "[r]evenue, costs and profits that You derive," and about "the manufacture, fabrication,
26 and/or assembly of the Infringing Instrumentalities." Any production by UMC of information
27 sought by the Subpoena will be made pursuant to the Protective Order governing the disclosure
28

1 of confidential information in the underlying action. UMC reserves the right to insist upon
2 supplemental protections.

3 In view of these specific objections and the foregoing Preliminary Statement, General
4 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing a
5 witness to testify on UMC's behalf about this Topic.

6 **TOPIC NO. 10:**

7 Your customers, other than Defendants, whose products are/were manufactured,
8 fabricated, and/or assembled using any and all Manufacturing Equipment.

9 **OBJECTIONS TO TOPIC NO. 10:**

10 UMC incorporates each of its General Objections, Objections to Definitions, and
11 Objections to Instructions herein by reference. UMC further objects to this Topic to the extent it
12 seeks information that is protected from discovery by the attorney-client privilege, the attorney
13 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
14 this Topic to the extent it seeks information not in UMC's possession, custody or control.

15 UMC further objects to this Topic as overbroad, vague and ambiguous, imposing undue
16 burden and expense, calling for a legal conclusion, providing insufficient identification and
17 specificity, requiring subjective judgment and speculation, seeking information that is not
18 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
19 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
20 Civil Procedure, at least to the extent it seeks information about "Your customers, other than
21 Defendants," and about "any and all Manufacturing Equipment."

22 UMC further objects to this Topic as seeking trade secret and/or other confidential
23 research, development, or commercial information, at least to the extent it seeks information
24 about "[y]our customers, other than Defendants." Any production by UMC of information
25 sought by the Subpoena will be made pursuant to the Protective Order governing the disclosure
26 of confidential information in the underlying action. UMC reserves the right to insist upon
27 supplemental protections.

1 In view of these specific objections and the foregoing Preliminary Statement, General
2 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing a
3 witness to testify on UMC's behalf about this Topic.

4 **TOPIC NO. 11:**

5 Any communications between You and any Equipment Manufacturer or any of the
6 Defendants concerning these Actions, Ocean, the Asserted Patents, or any of the Infringing
7 Instrumentalities.

8 **OBJECTIONS TO TOPIC NO. 11:**

9 UMC incorporates each of its General Objections, Objections to Definitions, and
10 Objections to Instructions herein by reference. UMC further objects to this Topic to the extent it
11 seeks information that is protected from discovery by the attorney-client privilege, the attorney
12 work-product doctrine, or any other applicable privilege or immunity. UMC further objects to
13 this Topic to the extent it seeks information not in UMC's possession, custody or control.

14 UMC further objects to this Topic as overbroad, vague and ambiguous, imposing undue
15 burden and expense, calling for a legal conclusion, providing insufficient identification and
16 specificity, requiring subjective judgment and speculation, seeking information that is not
17 relevant to any party's claim or defense and proportional to the needs of the case, and seeking to
18 impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of
19 Civil Procedure, at least to the extent it seeks information about "any Equipment Manufacturer,"
20 about "any of the Defendants," and about "any of the Infringing Instrumentalities."

21 UMC further objects to this Topic as seeking information that is more readily and/or
22 appropriately available from, or confidential to, another non-party, at least to the extent it seeks
23 information about "[a]ny communications between You and any Equipment Manufacturer," and
24 about "any of the infringing Instrumentalities."

25 UMC further objects to this Topic as seeking information that that is available from one
26 or more parties to the underlying action, and duplicative of other discovery already taken or
27
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1 requested in the underlying action, at least to the extent it seeks information about “[a]ny
2 communications between You and ... any of the Defendants.”

3 UMC further objects to this Topic as seeking trade secret and/or other confidential
4 research, development, or commercial information, at least to the extent it seeks information
5 about “any of the Infringing Instrumentalities.” Any production by UMC of information sought
6 by the Subpoena will be made pursuant to the Protective Order governing the disclosure of
7 confidential information in the underlying action. UMC reserves the right to insist upon
8 supplemental protections.

9 In view of these specific objections and the foregoing Preliminary Statement, General
10 Objections, Objections to Definitions, and Objections to Instructions, UMC is not producing a
11 witness to testify on UMC’s behalf about this Topic.

12
13 DATED: February 10, 2022

By: /s/ Robert G. Litts

14 Robert G. Litts (No. 205984)
15 CANDESCENT LAW GROUP
16 1350 Old Bayshore Hwy, Ste. 520
17 Burlingame, CA 94010
Telephone: (925) 644-1102
robert.litts@candescentlaw.com

18 Attorney for Non-Party
19 UNITED MICROELECTRONICS
20 CORPORATION

CERTIFICATE OF SERVICE

I, Robert G. Litts, hereby certify that on February 10, 2022, I caused a true and correct copy of the foregoing document to be served on counsel listed below via electronic mail and U.S. Mail:

By Electronic Mail:

Alex Chan
DEVLIN LAW FIRM LLC
1526 Gilpin Avenue
Wilmington, DE 19806
Telephone: (302) 449-9010
achan@devlinlawfirm.com

Joel Glazer
DEVLIN LAW FIRM LLC
1526 Gilpin Avenue
Wilmington, DE 19806
Telephone: (302) 449-9010
jglazer@devlinlawfirm.com

Peter Mazur
DEVLIN LAW FIRM LLC
1526 Gilpin Avenue
Wilmington, DE 19806
Telephone: (302) 449-9010
PMazur@devlinlawfirm.com

By U.S. Mail:

Alex Chan
DEVLIN LAW FIRM LLC
1526 Gilpin Avenue
Wilmington, DE 19806
Telephone: (302) 449-9010
achan@devlinlawfirm.com

/s/ Robert G. Litts
Robert G. Litts
CANDESCENT LAW GROUP